EXPORT PLANT

INSTITUTIONAL CONTROL OPTIONS

OPERATION & MAINTENANCE (O & M) WORK GROUP

D R A F T

JUNE 9, 2010

SECTION 1

RECORD OF DECISION COVER SHEET AND INSTITUTIONAL CONTROLS LANGUAGE

RECORD OF DECISION
FOR
LIBBY ASBESTOS SUPERFUND SITE
THE FORMER EXPORT PLANT
OPERABLE UNIT 1
LINCOLN COUNTY, MONTANA

May 2010

12.3.2 ICs

ICs, or land use restrictions, are often placed on properties to limit activities that could compromise the integrity of the remedy. ICs such as restrictive covenants, zoning ordinances, easements, deed restrictions, and public information serve to limit use of reclaimed areas to acceptable activities or guide behavior to avoid exposures that may exceed health-based levels. ICs also provide for an orderly transfer of land use, such as when open space lands may be proposed for commercial or industrial use. ICs also provide for the proper transfer of ownership so that land restrictions are clear when ownership changes. The controls may allow residential, commercial, and recreational land use, but will limit uses that might create an exposure pathway or damage the remedy.

For OU1, ICs will be used to restrict use of areas containing contaminated soil, including subsurface soil covered under previous response actions and subsurface contamination remaining below excavated areas. EPA anticipates that ICs for OU1 will include governmental and/or proprietary land use restrictions, and informational devices. Governmental ICs, for example, may impose land or resource restrictions using government authority, such as building codes, permits, or zoning regulations that are administered by local agencies. Proprietary controls, either private, governmental, or a combination of the two, typically involve landowner agreements or easements that restrict certain activities on the property.

A utility locate service, such as U-Dig, may also be considered as a way to notify anyone disturbing the ground that asbestos contamination may be found below the ground surface. U-Dig is a local service that people call at no cost before digging at their property to locate underground hazards (e.g., electrical lines). U-Dig could add "known areas of subsurface vermiculite at OU1" to their database of underground hazards using information provided by EPA. Advice on how to address the contamination, if disturbance is required, would be obtained from the ERS. The ERS is a position currently staffed in Libby by EPA which may be transitioned to another government entity when remedial action across the Libby site is complete. In addition to providing advice and instruction, the ERS will manage any contamination encountered. Additional informational devices include the EPA Information, ad, handouts, and contractor training classes. Specific details will be developed in the remedial design process.

EPA will work closely with the MDEQ, the City of Libby, MDT, and the City and County Board of Health in the remedial design process to ensure that the controls selected will be implementable and will achieve the desired results. ICs are considered an integral part of the remedy, so development and implementation of the ICs will be conducted as part of the remedial action. Response actions are funded through a settlement with Grace.

SECTION 2

U-DIG FAQs, MAP, SCHEMATIC

What is UDIG?

UDIG is the recognized One Call Locate Center serving all of Flathead County, most of Lincoln County, and parts of Sanders and Lake County. The UDIG system is administered by the Flathead Valley Utility Coordinating Council (FVUCC).

What is the Flathead Valley Utility Coordinating Council?

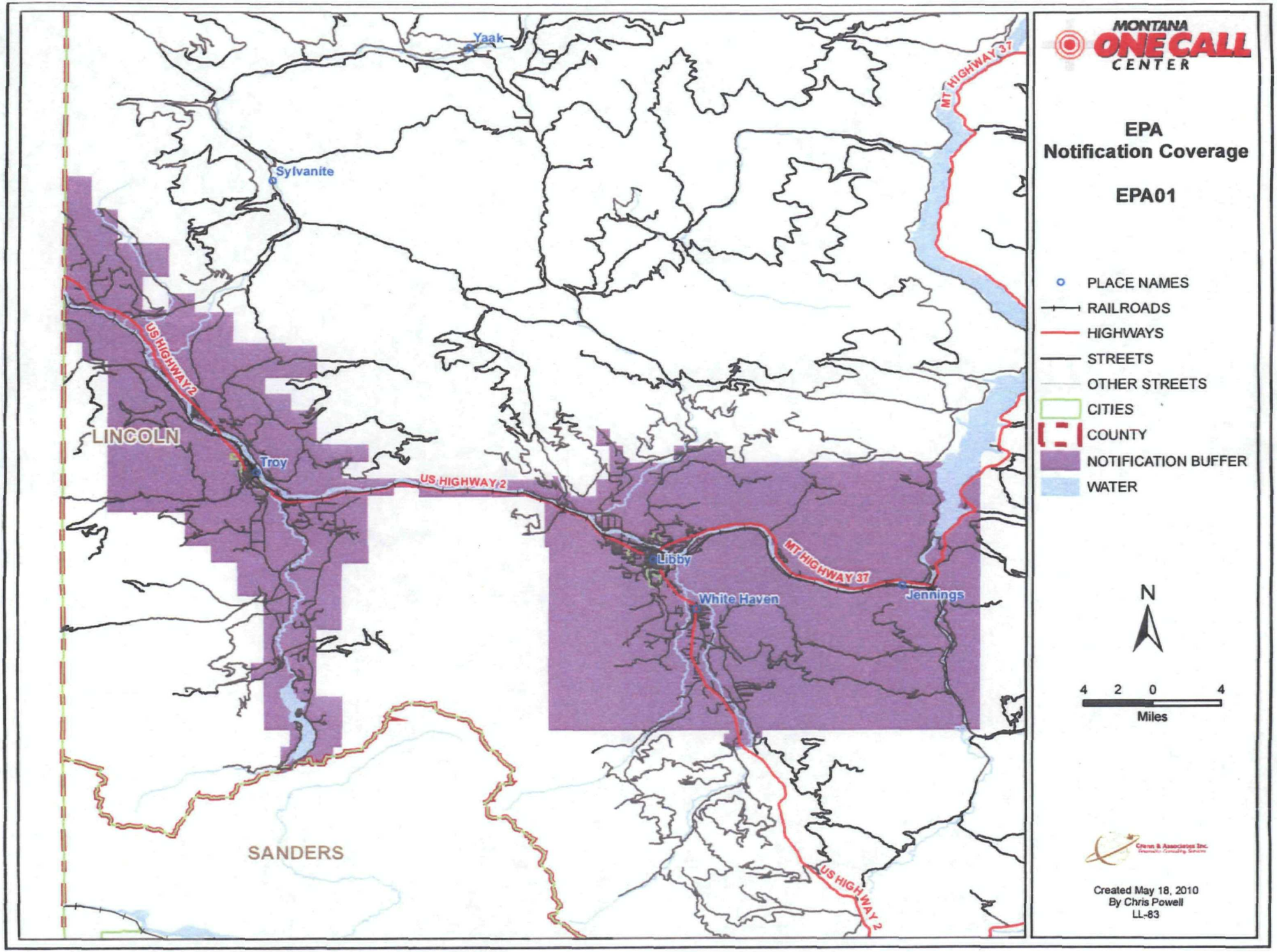
The Flathead Valley Utility Coordinating Council is a non-profit corporation whose members are owners of buried facilities within the UDIG service territory. The FVUCC, Inc. contracts the Montana One Call Center to provide "One Call Locate Center" services.

Does UDIG locate everything that is buried?

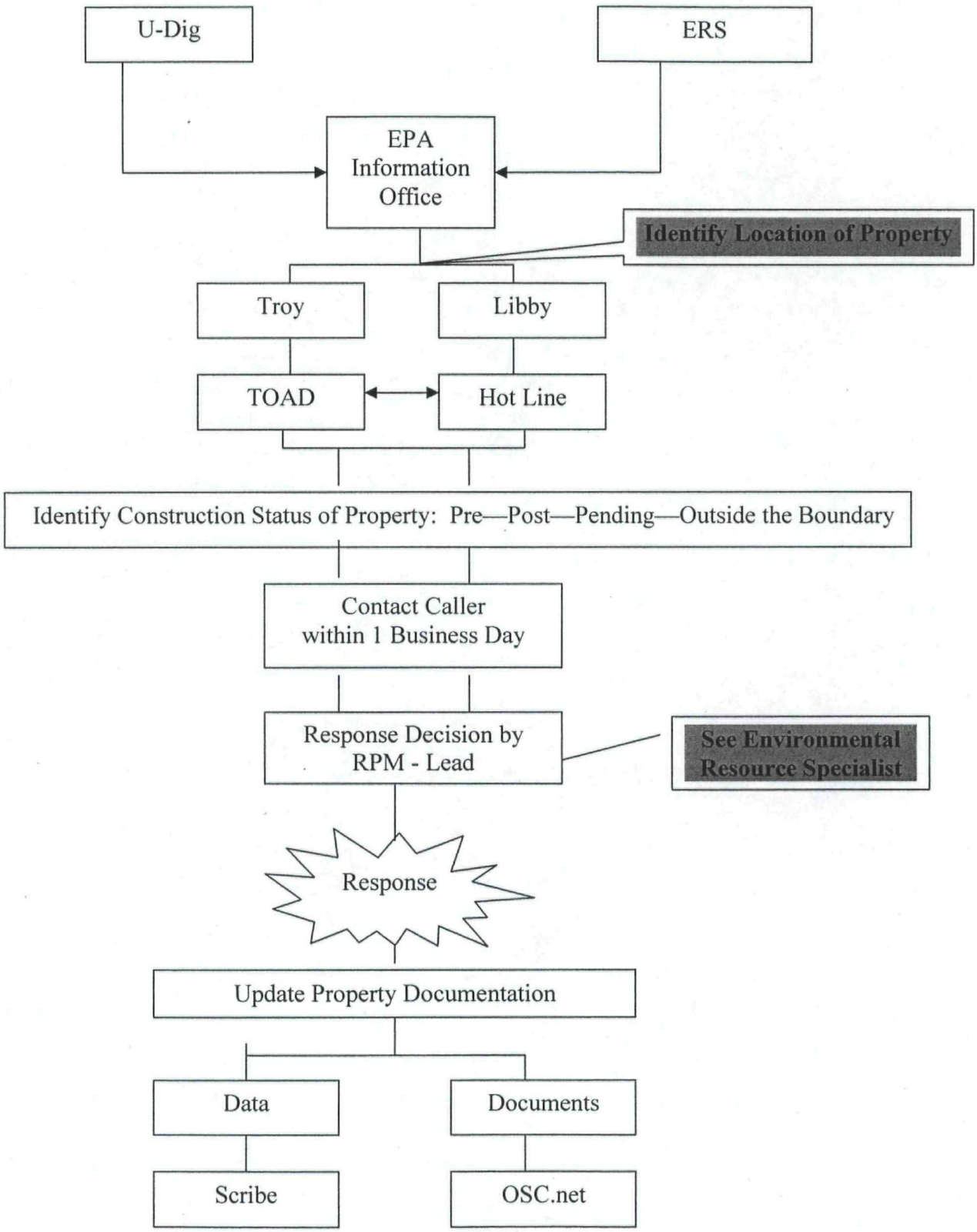
No, UDIG doesn't locate anything. UDIG is a program that strives to serve as an efficient communications channel between excavators and the owners of buried facilities that could be damaged during an excavation. The owners of the underground facilities are the entities that are required by law to provide information about location of their buried systems. These owners may send their one employees to provide this information or they may contract a private company such as One Call Locators, Inc. to do that for them. In addition, UDIG members only mark their property. Privately owned power lines, gas lines, sewer service lines, septic tanks, water lines, satellite cable lines, private phone lines, underground sprinkler systems, etc. are not marked. The owner of those buried facilities is responsible for identifying their location.

What is the Montana One Call Center?

The Montana One Call Center is the answering service that picks up the phone when you call UDIG at 755-8344 or 1-800-551-8344. The Montana One Call Center is a private firm located in Kalispell, Montana, that contracts to provide Call Center Services. This is essentially an answering service that receives calls from excavators or anyone that has called UDIG to request that the location of underground utilities be identified to enable a safe excavation. The Montana One Call Center then notifies FVUCC members that have buried facilities in the general area of the excavation. The Montana One Call Center does not have access to detailed information about the location of underground utilities and other buried facilities. In addition, the Montana One Call Center does not have detailed information about the status of the field activity related to response to a locate request. The Montana One Call Center is the single point contact that receives notifications about proposed digging and excavations and notifies any FVUCC members that have buried facilities. The Montana One Call Center is the single point contact that will notify FVUCC members if an excavator calls back to seek further information about a line location request.


MONTANA ONE CALL CENTER
EPA
Notification Coverage
EPA01
PLACE NAMES
RAILROADS
HIGHWAYS
STREETS
OTHER STREETS
CITIES
COUNTY
NOTIFICATION BUFFER
WATER
N
4 2 0 4
Miles
Created May 18, 2010
By Chris Powell
LL-83
Yaak
Sylvanite
MT HIGHWAY 37
US HIGHWAY 2
LINCOLN
Troy
US HIGHWAY 2
Libby
MT HIGHWAY 37
Jennings
White Haven
SANDERS
US HIGHWAY 2

U-Dig/ERS Protocol
Libby – Area of Interest



SECTION 3

CITY OF LIBBY BUILDING PERMIT REQUIREMENTS AND APPLICATION

City of Libby
952 E. Spruce St.
Post Office Box 1428
Libby, Montana 59923

Phone 406-293-2731
Fax 406-293-4090

BUILDING PERMIT

REQUIREMENTS

AND

APPLICATION

BUILDING PERMIT REQUIREMENTS

WHAT IS A BUILDING PERMIT?

A building permit gives you the legal permission to start construction of a building project in the city limits. . Permits are needed to keep track of and monitor construction work within the city. They help to assure an acceptable level of safety, convenience, health and quality by ensuring that work is done in conformance with City, State and National regulations.

In addition to a city building permit, you may also need a state issued electrical permit, plumbing permit and a mechanical permit. These permit applications are available from the city or from any licensed contractor specializing in the area.

WHEN IS A BUILDING PERMIT REQUIRED?

The construction, addition, alteration, repair or demolition of any structure within the city limits requires a city issued general permit. A permit is also required any time the use of the building is to be changed. This is to ensure that the new use can be safely conducted within the facility. Permits are not required for tool or storage sheds under 120 square feet. Fences under 6 feet high. Retaining walls not over 4 feet high. Sidewalks and driveways. Painting, papering, tiling, carpeting, cabinets or counter tops and similar finish work. Play ground equipment.

HOW DO I GET A PERMIT?

You must first obtain a building permit application. These are available at city hall or from the building inspector. For most projects you will be required to submit 1 set of drawings or plans and specifications which define the scope, intent, and method of construction. Typically the drawings are required to have the following information.

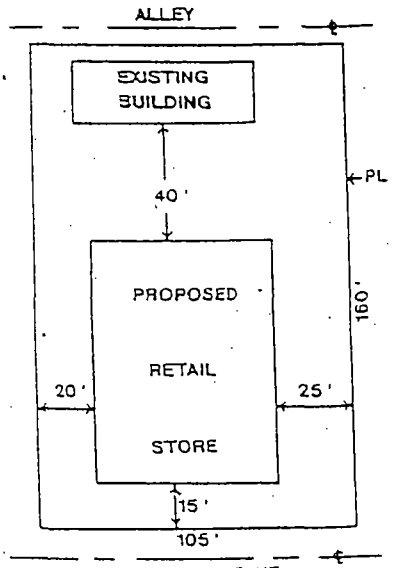
A. Site plan, showing property lines, location of structures, location of existing and proposed utilities, parking areas and adjacent streets or alleys.

B. Floor plans showing the use and relationship of spaces, sizes, doorways, windows fixtures and stairways. Actual floor plans must show dimensions and handicapped accessible features if needed.

C. Section view through the building detailing the size and type of materials used and how they are to be assembled.

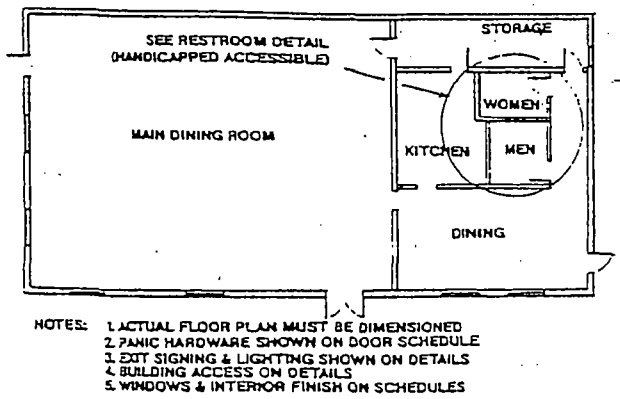
D. Additional information may be required for commercial and multi-family structures or for other unusual or hazardous structures.

Below are some sample drawings and specifications that typically show the information required on your plans. Your plans should be large enough to show sufficient dimensions and detail.



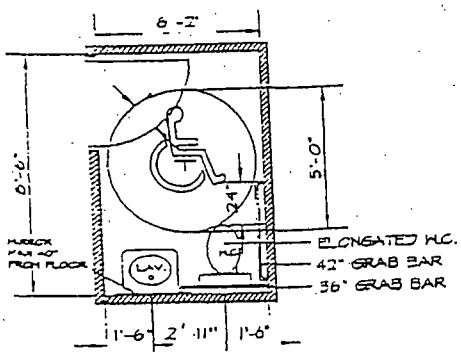
N.T.S.

EXAMPLE SITE PLAN

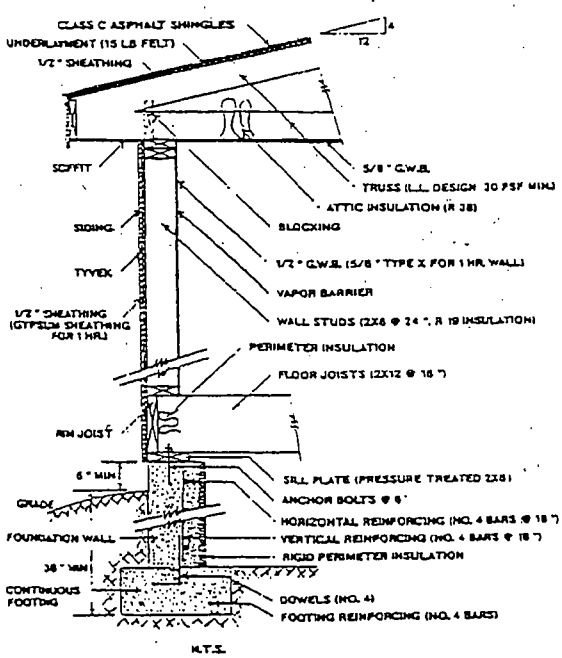


N.T.S.

EXAMPLE BUILDING FLOOR PLAN



TYPICAL HANDICAP TOILET



N.T.S.

EXAMPLE EXTERIOR WALL SECTION

After you submit your plans and your permit application, the building official will review your application and will issue the permit. You will be contacted and your permit can be picked up and paid for at city hall during regular business hours.

APPENDIX L
PERMIT FEES

TOTAL VALUATION	FEE
$1 to $ 500	$24
$501 to $2,000	$24 for the first $500; plus $3 for each additional $ 100 or fraction thereof, to and including $2,000
$2,001 to $40,000	$69 for the first $2,000; plus $11 for each additional $1,000 or fraction thereof, to and including $40,000
$40,001 to $100,000	$487 for the first $40,000; plus $9 for each additional $1,000 or fraction thereof, to and including $100,000
$100,001 to $500,000	$1,027 for the first $100,000; plus $7 for each additional $1,000 or fraction thereof, to and including $500,000
$500,001 to $1,000,000	$3,827 for the first $500,000; plus $5 for each additional $1,000 or fraction thereof, to and including $1,000,000
$1,000,001 to $5,000,000	$6,327 for the first $1,000,000; plus $3 for each additional $1,000 or fraction thereof, to and including $5,000,000
$5,000,001 and over	$18,327 for the first $ 5,000,000; plus $1 for each additional $1,000 or fraction thereof

Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov
PERMITTING & COMPLIANCE DIVISION
Waste & Underground Tank Management Bureau

MEMORANDUM

TO: Contractors, Building Owners, and Building Permit Applicants

DATE: June 7, 2007

FROM: Department of Environmental Quality, Asbestos Control Program

SUBJECT: Required Asbestos Inspection Prior to Building Remodeling, Renovation, and Demolition Activities

According to the Montana Asbestos Control Act (ACA) and Administrative Rules of Montana, (ARM) 17.74.354, an asbestos inspection is required to be conducted prior to building remodeling, renovation, or demolition activities. The asbestos inspection determines whether asbestos-containing materials (ACM) are present and whether the ACM needs to be removed prior to remodeling, renovation or demolition activities. Over 3000 different materials were made using asbestos. Building demolition/renovation activities can disturb ACM releasing asbestos fibers, which can be inhaled or ingested. Exposure to asbestos can result in asbestos related illnesses. Preventing asbestos exposures and complying with applicable regulations starts with a thorough asbestos inspection.

Building demolition/renovation activities include demolition, razing, wrecking, burning, moving, altering the structure and includes, but is not limited to, remodeling, electrical, plumbing, roofing, siding, flooring, insulating, drywalling, painting, texturing, gutting, demolition, mechanical, structural, and other types of deconstruction or related work.

The building owner and the contractor are responsible for ensuring that a thorough asbestos inspection is conducted by an asbestos inspector who is accredited (licensed) by the Department of Environmental Quality (DEQ) in accordance with the asbestos rules.

The Montana Department of Environmental enforces the Asbestos Control Act. Building owners and contractors who violate the ACA are potentially subject to penalties ranging from $10,000 to $25,000 per day for each violation.

For more information on the asbestos inspection requirement, locating an accredited asbestos inspector, and other asbestos regulatory requirements, log onto www.deq.mt.gov/Asbestos/index.asp or call (406) 444-5300.

g/wut/asbestos/memos/bldgcode2007

24.301.139 INVESTIGATION FEES ASSESSED FOR WORK COMMENCING WITHOUT BUILDING PERMIT (1) In accordance with Subsection 108.4 of the International Building Code, the department shall assess investigation fees for any work commenced on a building or structure before obtaining the necessary permits. The investigation fees will be 50 percent of the combined plan review and building permit fee, with a minimum fee of $250 and a maximum fee not to exceed $1000. (History: 50-60-104, 50-60-203, MCA; IMP, 50-60-103, 50-60-104, 50-60-201, MCA; NEW, 2004 MAR p. 2103, Eff. 9/3/04.)

Rules 24.301.140 and 24.301.141 reserved

NEXT PAGE IS 24-30331

INSPECTION RECORD

APPLICATION NUMBER:
OWNER:
ADDRESS:

FOUNDATION INSPECTION: To be made after footings are in place and any required forms for foundations are in place.

Date Inspected: Signed:

CONCRETE SLAB OR UNDERFLOOR INSPECTION: To be made after all inslab or under floor service equipment is in place, but before any concrete or subfloor is installed.

Date Inspected: Signed:

FRAME INSPECTION: To be made after the roof, all framing, fire blocking and bracing are in place and all pipes, chimneys and vents are complete and the rough electrical, plumbing, and heating wires, pipes and ducts are approved.

Date Inspected: Signed:

GYPSUM BOARD INSPECTION: To be made after all gypsum board is in place but before any plastering is applied or joints and fasteners are taped and finished.

Date Inspected: Signed:

FINAL INSPECTION: To be made after finish grading and the building is complete and ready for occupancy.

Dated Inspected: Signed:

Ron Higgins
Building Inspector
City of Libby

#5003309-01
291-0177 or 293-2731

LIBBY BUILDING PERMIT APPLICATION

Return this application along with all required plans and specifications to the City Building Official.

Project Location: _____
Owner: _____ Address & Phone _____
Contractor: _____ Address & Phone_____
Designer: _____ Address & Phone _____
Electrician _____Address & Phone_____
Plumber _____Address & Phone_____

Describe the nature of the project and its use:

Type of project:
___Commercial ___Residential ___New ___Addition ___Alteration ___Repair ___Move ___Demolition

Describe the nature of the project: _____

Estimated total cost: (labor and materials) $_____

BY EXECUTING THIS APPLICATION IT IS AGREED THAT:

1. The information supplied is true and correct.
2. This project may be subject to other laws and regulations, including but not limited to Federal and State Regulations, ADA handicapped requirements, Energy Code requirements or zoning regulations.
3. This permit is issued as described on the plans submitted. Any changes must get additional approval.
4. Separate electrical, plumbing and mechanical permits issued by the State of Montana are required.
5. Construction of the proposed project may not be started until the fees are paid and the permit is issued. An additional investigation fee of up to 50% of the total permit fee may be charged for projects started without a permit.
6. A certificate of occupancy needs to be issued before the building can be used.

Signature of Applicant _____ Date:_____

SECTION 4

MDT'S ADDENDUM TO APPROACH AND ENCROACHMENT/OCCUPANCY PERMIT

ADDENDUM TO MDT APPROACH AND ENCROACHMENT/OCCUPANCY PERMIT NOTIFICATION OF LIBBY AMPHIBOLE ASBESTOS

MDT right-of-way surface soil located within the boundaries of the Libby Asbestos National Priorities List Superfund site may contain ubiquitous amounts of amphibole asbestos contamination sourced from the historic mining, processing, and transport of vermiculite from the former W.R. Grace Mine located north of Libby, MT. The releases of Libby amphibole asbestos (LA) to the environment have caused a range of adverse health effects in exposed people, including not only workers at the mine and processing facilities, but also residents of Lincoln County.

Testing by MDT and the U.S. Environmental Protection Agency (EPA) has confirmed the presence of LA in both asphalt aggregate and in MDT right-of way surface soil on MT 37 north of the Kootenai River Bridge to past the junction with Rainy Creek Road. Though not yet tested, LA may also be present in trees and vegetation.

(Name of Permittee) is hereby put on notice that undiscovered areas of LA contamination may be present in MDT right-of-way surface soil in the permit area. Permittee should take all appropriate precautions to guard against potential exposure to LA contamination by its agents, employees, or other third parties while conducting any soil or vegetation disturbance in MDT right-of-way in the permit area. Permittee shall notify the EPA to report any planned disturbance of soil or vegetation within the permit area, at (406) 291-5335. For additional information or questions, Permittee may contact the EPA or MDT Environmental Services in Helena, MT at (406) 444-7632.

Permittee, its agents and employees, agree to protect, defend and indemnify the State of Montana, MDT, its agents, and employees, and save and hold each of them harmless from and against all claims, demands and causes of action of any kind or character, including defense costs, arising from activities conducted under this permit, from any claims or causes of action from the Permittee's agents, employees, or other third parties arising from or allegedly due to activities under this permit, and from any claims, demands and causes of action of any kind or character, including defense costs, or damages due to or allegedly caused to any third parties for personal injuries, property damage, loss of life or property, civil penalties, or criminal fines resulting from or in any way connected with activities pertaining to this permit.

This Addendum constitutes an addition to said permit. All other provisions of said permit remain unchanged.

SECTION 5

ERS WORK PLAN

Libby Asbestos Project

ENVIRONMENTAL RESOURCE SPECIALIST PLAN

April 2009
DC2616.012.201.ERSOP-2854.00

Prepared by:
United States Environmental Protection Agency
Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

and:
United States Department of Transportation
Research and Innovative Technology Administration
John A. Volpe National Transportation Systems Center
Environmental Engineering Division, RVT-43
55 Broadway
Cambridge, Massachusetts 02142-1001

and:
CDM Federal Programs Corporation
One Cambridge Place
50 Hampshire Street
Cambridge, Massachusetts 02139-1548

Environmental Resource Specialist Plan
Libby Asbestos Project
Libby, Montana

April 2009

DC2616.012.201.ERSOP-2854.00

Reviewed by: _____ Date: 4/7/2009
Courtney Zamora
Volpe Center Site Manager

Reviewed by: _____ Date: 4/7/2009
Paul Lammers
CDM Onsite Construction Manager
CDM Technical Reviewer

Reviewed by: _____ Date: 4/8/09
Mike Cirian, PE
EPA Remedial Project Manager

Reviewed by: _____ Date: 4-8-2009
Victor Ketellapper, PE
EPA Libby Superfund Site Team Leader

Contents

Acronyms and Abbreviations

Acronyms and Abbreviations

A&E	architectural and engineering firm
AHERA	Asbestos Hazard Emergency Response Act
CDM	CDM Federal Programs Corporation
CIC	Community Involvement Coordinator
CSP	Certified Safety Professional
CSS	Contaminant Screening Study
CSHASP	Comprehensive Site Health and Safety Program
DAR	Design Analysis Report
DBO^2	Design, Build, Own, Operate, Inc.
eLASTIC	electronic Libby Asbestos Sample Tracking Information Center
EPA	United States Environmental Protection Agency
ERS	Environmental Resource Specialist
ERS HASP	Environmental Resource Specialist Health and Safety Plan
GPS	global positioning system
HAZWOPER	Hazardous Waste Operations and Emergency Response
HEPA	high efficiency particulate air
H&S	health and safety
MT DEQ	Montana Department of Environmental Quality
NA	not applicable
NPE	negative pressure enclosure
OSHA	Occupational Safety and Health Administration
PCC	Property Closeout Checklist
PDI	pre-design inspection
PDIWP	Pre-Design Inspection Work Plan
PE	Professional Engineer
PPE	personal protective equipment
QA	quality assurance
QA/QC	quality assurance/quality control
RA SAP	Response Action Sampling and Analysis Plan
RAWP	Response Action Work Plan
RPM	Remedial Project Manager
SOW	statement of work
SUA	specific use area
TAPE	Troy Area Property Evaluation
VCI	vermiculite-containing insulation
VCS	vermiculite-containing soil
Volpe	John A. Volpe National Transportation Systems Center
yd^3	cubic yards

Section 1
Introduction

1.1 Program Objective

The objective of the Environmental Resource Specialist (ERS) program is to provide Libby-area property owners with a means to mitigate potential exposure to Libby vermiculite during routine and non-routine activities. These activities may consist of, but are not limited to: building repair, remodeling, maintenance, utility servicing, installation, and construction.

Specifically, the ERS program provides property owners/residents with information related to Libby vermiculite and guidance on safely working with material potentially containing Libby vermiculite. ERS personnel may conduct onsite evaluations of reported situations, providing recommendations, if necessary, of methods to safely continue the intended work activities. ERS response types may range from an Information Only evaluation to a Planned Design Response.

1.2 Document Purpose

The purpose of this ERS Plan is to guide personnel in their day-to-day ERS evaluation and response activities. Included are: defined roles and responsibilities of all ERS personnel; training requirements; response types and activities; and required procedures and associated documentation. Each property and situation encountered by ERS personnel may be unique, and may require site-specific response activities.

This ERS Plan includes an Appendix, which contains ERS-related forms and documentation templates.

The reader is referred to the *Pre-Design Inspection Work Plan* (PDIWP), *Revision 1, Libby, Montana* (CDM Federal Programs Corporation [CDM] 2003a) and *Response Action Sampling and Analysis Plan* (RA SAP), *Revision 1, Libby, Montana* (CDM 2008a), for details on sample collection procedures, analytical methods, and applicable field and laboratory quality assurance (QA) procedures.

This ERS Plan is not intended to be used as a sampling and analysis plan.

This ERS Plan complements other project guidance documents that detail different aspects of Libby amphibole asbestos remediation in Libby. Other documents include the: *Response Action Work Plan* (RAWP) (CDM 2008b), *Final Draft Design Analysis Report* (DAR), *Libby, Montana* (CDM 2003b), *Libby Asbestos Site Residential/Commercial Cleanup Action Level and Clearance Criteria Technical Memorandum* (United States Environmental Protection Agency [EPA] 2003), *Comprehensive Site Health and Safety Program* (CSHASP), *Libby, Montana* (CDM 2006), *Environmental Resource Specialist Health and Safety Plan* (ERS HASP) (CDM 2007a), and *High Efficiency Particulate Air (HEPA) Vacuum Program Memorandum, Libby, Montana* (John A. Volpe National Transportation Systems Center [Volpe] 2003).

As necessary, this ERS Plan will be modified to reflect EPA requirements and changes in the scope of the project.

1.3 Quality Assurance

The Libby Project has established a formal QA program to ensure that a high level of quality is maintained throughout all stages of the project. The QA program includes, but is not limited to: independent review of deliverables; planning and conducting assessments and audits; and ensuring any noncompliance discovered during assessments or audits is corrected. All work performed by the architectural and engineering firm (A&E) under the ERS Plan is conducted in accordance with quality procedures described in the A&E's *Quality Assurance Manual* (CDM 2007b) as modified by the *Quality Implementation Plan* (CDM 2008c).

Technical proposals and work plans (e.g., this document) require a QA section. A member of the A&E QA staff has prepared this ERS Plan section and will maintain QA oversight for the duration of the work conducted by the A&E under the ERS Plan.

File maintenance, storage, and control for all original ERS-related field documentation are conducted at the A&E field office in Libby, Montana. Copies (electronic or hard copy, as applicable) of field documentation are maintained at the A&E office in Denver, Colorado. Project documentation produced by the A&E is indexed and tracked by the Libby file administrator. Copies of all relevant documents will be provided to the government contracting officer on a periodic basis as identified by the Government Contracting Officer's Site Manager. Electronic sampling and analytical data is ultimately stored in the Libby2 project database, which is housed on a secure EPA server in Denver, Colorado, and managed by the Government Contracting Officer's Database Manager. Other data pertinent to ERS activities is entered into a variety of EPA-approved data tracking systems (e.g., Design, Build, Own, Operate, Inc. [DBO^2], Hotline) in Libby, Montana, and provided to the Government Contracting Officer's Database Manager electronically on a regular schedule or as requested. Global positioning system (GPS) data is currently stored in the GPS database managed by A&E staff in Denver, Colorado. Maintenance of project data tracking systems is provided by A&E information management systems personnel, with government contracting officer consultation. Details regarding project data storage and associated quality assurance/quality control (QA/QC) mechanisms (e.g., quality or validation checks) are included in the RA SAP, which governs ERS sampling activities.

The QA program includes both self-assessments and independent assessments as checks on the quality of the data and reports produced in this program. The A&E QA Director determines the frequency of field and office audits, considering client requirements as well as the scope and duration of the work. Office and field audits will each be performed at least once per 12-month period or more frequently, if requested by the Government Contracting Officer's Site Manager.

Section 2
Roles and Responsibilities

The following sections describe the roles and responsibilities of all project personnel involved with ERS-related activities.

2.1 EPA Remedial Project Manager

The EPA Remedial Project Manager (RPM):

- Ensures that the program and its resources are managed in order to successfully meet its goals and objectives.
- Provides overall direction and guidance for ERS response activities.
- Provides technical expertise to property owners/residents and ERS personnel.
- Coordinates response activities with the community and local, state, and federal agencies as needed.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.2 Government Contracting Officer's Site Manager

The Government Contracting Officer's Site Manager:

- Ensures that the program and its resources are managed in order to successfully meet its goals and objectives.
- Manages the contractual procurement necessary for the appropriate response action.
- Establishes and manages the response schedule, including contractor compliance with target dates.
- Directs ERS contractor and A&E activities.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.3 A&E Health and Safety Manager

The A&E Health and Safety (H&S) Manager:

- Works with project management to implement an H&S program and plan in accordance with project criteria and regulatory standards.
- Monitors ERS program activities for compliance with established H&S protocol, modifying H&S procedures as necessary.
- Provides technical expertise to ERS personnel as needed.

- Provides assistance with development of the statement of work (SOW).
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.4 A&E ERS Lead

The A&E ERS Lead:

- Acts as the main point of contact for all ERS-related activities.
- Responds to property owner inquiries through the ERS tracking system and in the field, providing technical expertise.
- Performs initial assessments, recommending ERS response activities.
- Facilitates communication among ERS personnel.
- Ensures all required project and ERS-specific documentation is completed for ERS Lead activities performed.
- Develops the SOW.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.5 A&E Community Involvement Coordinator

The A&E Community Involvement Coordinator (CIC):

- Acts as the main property owner/resident point of contact for all Planned Design Response activities.
- Ensures that contractual documents are explained to and signed by the property owner/resident for all Planned Design Response activities.
- Ensures that all required project and ERS-specific documentation is completed for A&E CIC activities performed.
- Facilitates the owner's/resident's relocation and reimbursement as necessary during Planned Design Response activities.
- Provides assistance with development of the SOW.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.6 A&E Design Team

The A&E Design Team:

- Manages the generation and submittal of each SOW, including all necessary revisions, to the Government Contracting Officer's Site Manager for contractor response activities.
- Ensures that all SOWs comply with project and ERS design requirements.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.7 A&E ERS Administrative Support Team

The A&E ERS Administratrive Support Team:

- Ensures that all required project and ERS documentation is completed for the property and project files.
- Facilitates communication among ERS personnel.
- Maintains the log of ERS calls, updating the ERS tracking system as necessary.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.8 A&E Response/Restoration Oversight Team

The A&E Response/Restoration Oversight Team:

- Provides assistance with development of the SOW.
- Oversees implementation of the SOW in the field, reporting to the Government Contracting Officer's Site Manager and EPA RPM with progress and schedule updates.
- Complies with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

2.9 ERS Response Contractor

The ERS Response Contractor:

- Ensures that all response contractor activities (i.e., Immediate Small-Scale Response or Planned Design Response) comply with the requirements of the SOW.
- Maintains the established contractual response schedule, providing regular updates to the Government Contracting Officer's Site Manager.
- Ensures that all response contractor personnel comply with the requirements of this ERS Plan, the ERS HASP, and the CSHASP.

Section 3
Health and Safety

3.1 Health and Safety Plan

All personnel involved with ERS-related activities must comply with the requirements of the ERS HASP (CDM 2007a), a separate document to be used in conjunction with this ERS Plan. The ERS HASP includes material regarding ERS H&S organizational structure, ERS H&S protocol, site control measures, and emergency procedures.

In addition, the CSHASP (CDM 2006) dictates H&S protocol for the entire Libby Asbestos Project Site, and all ERS personnel are to comply with its requirements.

3.2 Training Requirements

In accordance with the ERS HASP, personnel participating in ERS initial assessment or response actions are required to complete the following:

- 40-Hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) Training
- 8-Hour HAZWOPER Refresher Training as necessary
- Respiratory Fit Testing as necessary
- Medical Surveillance Examinations as necessary
- EPA's *The Importance of Health and Safety, Mandatory Site Primer* (EPA 2004)

Following an initial baseline examination, the medical surveillance examination is to be completed annually. A qualified physician must determine the employee to be medically fit for their expected activities, including the use of a respirator.

Personnel acting as the A&E ERS Lead are also required to complete the following:

- 10-Hour OSHA Construction Safety Training

Additional training may be required following further evaluations of ERS activities.

3.2.1 Recommended Additional Training

In addition to the required training, the following are recommended additional training materials for the A&E ERS Lead:

- Asbestos Hazard Emergency Response Act (AHERA) Inspector training and certification
- A&E's online Asbestos (General Industry) Course THS104I
- A&E's online Respiratory Protection Course THS105I

Section 4
ERS Activities

ERS activities will generally follow the path outlined in the ERS Flowchart (Appendix Form A).

4.1 Notification

Notification of ERS inquiries of any kind will typically begin with the receipt of a call on the ERS (406-291-5335), EPA Information Center (406-293-6194), or Montana Department of Environmental Quality (MT DEQ) Information Center (406 295-9278) phone line. A determination will be made by the responder as to whether the inquiry merits ERS activities, and is therefore an actual ERS request.

4.1.1 ERS Phone Coverage

Personnel providing coverage for the ERS phone line will respond to ERS inquiries within 24 hours, including weekends and holidays.

4.1.2 Documentation

The ERS tracking system is a database in which all calls and visits to the EPA Information Center are recorded. Valid ERS queries received directly at the EPA Information Center or MT DEQ Information Office will be documented in the ERS tracking system by the A&E ERS Administrative Support personnel. This ERS tracking system entry will be forwarded to the A&E ERS Lead in order to begin an initial assessment.

Valid ERS inquiries received on the ERS phone line are to be documented by the responder on an ERS Tracking System Email Template (Appendix Form B). This template will be sent to the A&E ERS Administrative Support personnel by email for addition to the ERS tracking system. The A&E ERS Lead will also document all communication with the owner/resident on the Record of Communication Form (Appendix Form G), or an equivalent means.

If the ERS responder is able to provide all requested information over the phone, this will be considered an Information Only response and documented by the above means in the ERS Tracking System.

4.1.3 Troy Properties

The A&E ERS Lead will ensure that the MT DEQ is informed of any ERS activities performed for properties located in Troy.

4.2 Initial Assessment

Following notification, the A&E ERS Lead will typically perform a site visit in order to evaluate the situation and determine an appropriate response type. Initial assessments may fall into the following categories:

- Emergency: building fires, structure collapses, etc. which may require an interior and/or exterior assessment
- Interior (non-emergency)
- Exterior (non-emergency)

4.2.1 Emergency

Emergency evaluations involve extremely dangerous environments, such as fires, floods, and building integrity damage. ERS personnel should respond to these emergency situations only after they have contacted and secured the response of appropriate emergency services (e.g., Fire Department, Police Department).

Only qualified and competent personnel such as the EPA RPM, A&E ERS Lead, or A&E H&S Manager may perform assessments for an emergency. ERS personnel shall not assume any site authority during emergency responses. ERS personnel shall perform a strictly advisory role, coordinating with emergency service responders and providing technical expertise. This advisory role may include providing advice related to: exclusion zone setup, personal protective equipment (PPE), hazard control, dust suppression, and decontamination procedures.

4.2.2 Interior

ERS personnel may need to perform an interior initial assessment in order to determine a proper response. Typical interior assessment activities include, but are not limited to:

- Determining owner plans (e.g., demolition, remodeling, etc.).
- Inspecting insulation or building material suspected to contain Libby vermiculite in accordance with procedures outlined in the PDIWP (CDM 2003a).
- Evaluating the magnitude and nature of leaks or spills of Libby vermiculite.
- Evaluating the potential hazard of any exposed Libby vermiculite.

Only a response contractor designated by the government contracting officer with a prepared SOW may perform any removal or restoration activity potentially involving Libby vermiculite, including, but not limited to: vacuuming, caulking, sealing, excavating, backfilling, covering, and transporting for disposal. Non-response contractor ERS personnel, such as the A&E ERS Lead, are not to perform any of these activities regardless of the estimated quantity of material.

4.2.3 Exterior

ERS personnel may also perform an exterior initial assessment in order to determine a course of action. Typical exterior assessment activities include, but are not limited to:

- Determining owner plans (e.g., demolition, remodeling, construction, utility installation, etc.).
- Inspecting suspected vermiculite-containing soils (VCS), which may include potholing (i.e., hand digging inspection points) to evaluate the extent of potential VCS.
- Collecting soil samples as necessary. Investigatory samples will be collected in accordance with the PDIWP (CDM 2003a).
- Evaluating the magnitude of potential Libby vermiculite in the soil.
- Evaluating the potential hazard of any exposed VCS.

Only a response contractor designated by the government contracting officer with a prepared SOW may perform any removal or restoration activity potentially involving Libby vermiculite, including, but not limited to: vacuuming, caulking, sealing, excavating, backfilling, covering, and transporting for disposal. Non-response contractor ERS personnel, such as the A&E ERS Lead, are not to perform any of these activities regardless of the estimated quantity of material.

4.2.4 Documentation

Personnel performing initial assessments are required to document these activities in accordance with ERS-specific procedures and any other documents governing the work conducted for the specific response type. These ERS-specific procedures include the following:

- Updating the ERS tracking system by sending an email notification to the A&E ERS Administrative Support personnel. The ERS tracking system entry is created using the ERS Tracking System Email Template (Appendix B) and details the specific onsite activities performed.
- Completing a Primary Structure and Property Assessment Information Field Form (Appendix Form E) and/or Secondary Structure Information Field Form (Appendix Form F) when a Contaminant Screening Study (CSS) has not been performed at the property or is incomplete.
- Completing the ERS Initial Assessment Checklist (Appendix Form C).
- Maintaining photographic documentation in accordance with the RA SAP.

4.3 Response

Following an initial assessment, ERS personnel must determine the appropriate response type. The response type will typically be one of the following: Information Only or Contractor Quick Response. The Contractor Quick Response is further

categorized as an Immediate Small-Scale Response or Planned Design Response. These response types are described in this section.

Only a response contractor designated by the government contracting officer with a prepared SOW may perform any removal or restoration activity potentially involving Libby vermiculite, including, but not limited to: vacuuming, caulking, sealing, excavating, backfilling, covering, and transporting for disposal. Non-response contractor ERS personnel, such as the A&E ERS Lead, are not to perform any of these activities regardless of the estimated quantity of material.

Response documentation, including photographic documentation, will be maintained by ERS personnel in accordance with the RA SAP and ERS-specific procedures.

4.3.1 Information Only

Often times, a site initial assessment will only require the dispensing of advice or technical expertise to an owner/resident. The response in this case is considered Information Only. Examples of Information Only responses include:

- Providing visual confirmation whether suspect material potentially contains Libby vermiculite.
- Determining potential exposure pathways.
- Advising owners/residents on methods to mitigate exposure to Libby vermiculite (e.g., regular use of HEPA vacuum, sealing exposure pathways).
- Evaluating the integrity of past removal work, including existing seals in place.

4.3.2 Contractor Quick Response

When the individual performing the initial assessment determines that the situation requires more than an informational response, a Contractor Quick Response must be implemented. Contractor Quick Response types consist of the following:

- Immediate Small-Scale Response
- Planned Design Response

4.3.2.1 Immediate Small-Scale Response

If the ERS personnel performing the initial site assessment determines that government assistance to the owner/resident in a small-scale format (e.g., small quantity vacuums, limited sealing in place) is appropriate, an Immediate Small-Scale Response will be initiated. ERS personnel will make a field judgment as to whether necessary activities fall into this category. These activities will meet the following criteria:

- Short-term in nature, typically lasting less than one work day

- Must be performed by a response contractor
- Do not require the owner/resident to be relocated
- Require that a SOW, no matter how limited, be provided to the Government Contracting Officer's Site Manager

4.3.2.1.1 Statement of Work

ERS personnel, typically the A&E ERS Lead, must gather enough information during the initial site assessment in order for the Government Contracting Officer's Site Manager to provide a SOW to the response contractor. The A&E ERS Lead will develop and send to the Government Contracting Officer's Site Manager a SOW which includes at a minimum the following:

- Property owner and address
- Exact nature of work to be performed, including procedural steps to be taken by the response contractor
- Estimated quantity of material to be removed
- Exact or best estimation of area requiring a seal in place
- Restoration steps required
- Dates work may be performed
- Estimation of material and labor resources the response contactor will require

4.3.2.1.2 Interior

Interior activities which may fall under the Immediate Small-Scale Response category include, but are not limited to, the following:

- Small-scale (i.e., leaks and/or spills which, in the judgment of the A&E ERS Lead, do not require an associated interior cleaning) and short duration HEPA vacuuming of material potentially containing Libby vermiculite.
- Small-scale and short duration sealing in place of material potentially containing Libby vermiculite.
- Removal, transportation, or disposal of previously bagged material potentially containing Libby vermiculite.

4.3.2.1.3 Exterior

Exterior activities which may fall under the Immediate Small-Scale Response category include, but are not limited to, the following:

- Removal of flower pots or rocks which may potentially contain Libby vermiculite.

- Removal, transportation, or disposal of previously bagged material potentially containing Libby vermiculite.

- Eliminating potential exposure pathways by installing a protective cap, cover, or barrier over potential VCS.

4.3.2.1.4 Limitations of Immediate Small-Scale Responses

ERS activities during an Immediate Small-Scale Response will focus on maintaining the continuity of ongoing owner/resident activities or plans. ERS response actions will be geared towards removing material potentially contaminated with Libby vermiculite and/or mitigating potential exposure pathways so that the owner/resident may proceed with their plans in a safer manner. Contractors performing Immediate Small-Scale Responses will generally not perform remodeling or restoration activities.

4.3.2.2 Planned Design Response

A Planned Design Response will typically require a more extensive SOW as well as a larger scale and/or longer duration of work by the response contractor. Section 5 details the criteria and activities involved with an ERS Planned Design Response.

Section 5
Planned Design Response

A Planned Design Response will generally meet some of the following criteria:

- Requires relocation of the owner/resident
- Requires involvement by the A&E CIC
- Requires longer-term duration (i.e., lasting greater than one work day) of activities
- Requires removal of larger quantities of material potentially containing Libby *vermiculite*
- Requires larger-scale elimination of potential exposure pathways
- Requires an associated interior cleaning
- Requires larger-scale restoration activities

5.1 Community Involvement Coordinator Role

Generally, the A&E CIC is not the initial responder to an ERS inquiry by an owner/resident. Following an initial assessment by ERS personnel, A&E CICs will generally only be contacted once a determination has been made to proceed with a Planned Design Response. Once contacted, it is important that the A&E CIC respond quickly in order to prevent scheduling delays and to maintain communication with the impacted owners/residents.

The A&E CIC's role in an ERS Planned Design Response will be similar to that in a typical response action. This role includes the following:

- Complying with the guidelines and requirements established in the RAWP.
- Completing required RAWP and ERS-specific documentation.
- Ensuring proper flow of information and communication between the owner/resident and project ERS personnel.
- Assisting in development of the SOW. A&E CICs have a larger role in developing an ERS SOW than in a typical property-specific response action work plan. This role is detailed further in Section 5.2.1.

Once finalized, A&E CICs will review the SOW with the owners/residents and obtain a signature on the SOW, project standard access agreement, and project standard relocation paperwork (if owner/resident must be relocated).

EPA and the government contracting officer will make the final determination regarding required ERS activities and their scheduling based on recommendations from the A&E CIC and other ERS personnel.

The A&E CIC provides the owner/resident with information and updates regarding the Planned Design Response schedule, coordinating relocation dates as necessary. The A&E CIC will be the owner's/resident's main support means throughout the entire Planned Design Response process.

5.2 Statement of Work

5.2.1 Community Involvement Coordinator Input

The responding A&E CIC interviews the owner/resident to determine their plans and schedules, providing this information to the SOW developer.

Once the SOW is drafted, the A&E CIC will meet with the owner/resident and review the SOW. On occasion, the work plans need to be expanded or changed based on new information or changes from original conditions. In these cases, the A&E CIC will work in conjunction with the A&E Design Team and other ERS staff to revise the SOW, make recommendations for the government contracting officer, and implement the response activities.

5.2.2 ERS Lead and Design Input

The A&E ERS Lead will manage all phases of SOW development based on the response decision from the government contracting officer, incorporating recommendations from other ERS personnel. The SOW will be revised as necessary during the development phase, with the A&E ultimately producing and submitting the final document to the Government Contracting Officer's Site Manager within the prescribed delivery schedule. The SOW created will be the guiding document for ERS Planned Design Response activities at the property.

The A&E Design Team is responsible for ensuring that the SOW complies with project standard design protocol, unless otherwise directed by the Government Contracting Officer's Site Manager.

5.2.3 Health and Safety Input

The A&E H&S Manager and A&E H&S staff will provide technical support to ERS personnel developing the SOW. The A&E H&S staff reviews planned ERS activities and the SOW as necessary to ensure compliance with project H&S protocol.

5.2.4 Oversight Input

The A&E Response/Restoration Oversight Team provides construction expertise and technical reviews if needed during development and revision of the SOW.

5.3 Contractor Response

5.3.1 Contractor Activities

Following development, the Planned Design Response SOW is submitted to the Government Contracting Officer's Site Manager for approval. Once approved, the government contracting officer will select the response contractor and establish a schedule for the ERS activities.

Response contractor ERS work can generally be categorized as requiring interior or exterior activities, and some responses may require both types of activities. The following sections outline some of the more common interior and exterior response contractor activities to be expected during a Planned Design Response.

5.3.1.1 Interior

Response contractor activities may include, but are not limited to:

- Establishing exclusion zones and support zones, including negative pressure enclosures (NPEs) to contain work in potentially contaminated areas.
- Installing and utilizing decontamination facilities for personnel and equipment.
- Performing removals of material potentially containing Libby vermiculite using industrial HEPA vacuums and associated machinery.
- Performing interior cleanings within an NPE.
- Sealing in place material potentially containing Libby vermiculite, eliminating exposure pathways.
- Performing demolition of walls, ceilings, floors, etc. as needed to access and remove material potentially containing Libby vermiculite.
- Transporting removed material for disposal at an EPA-designated facility.
- Restoring impacted work areas as required by the SOW (e.g., installing insulation in removal areas).

5.3.1.2 Exterior

Response contractor activities may include, but are not limited to:

- Establishing exclusion zones and support zones.
- Installing and utilizing decontamination facilities for personnel and equipment.
- Performing removals of potential VCS using excavating equipment and associated heavy machinery.

- Performing structure demolitions as directed by EPA.
- Transporting removed material for disposal at an EPA-designated facility.
- Restoring impacted work areas as required by the SOW (e.g., backfilling with common fill and topsoil in removal areas).

5.3.2 ERS Lead or Oversight Activities

During response contractor implementation of the Planned Design Response SOW, A&E Response/Restoration Oversight activities may include, but are not limited to:

- Performing site walks with the ERS response contractors as necessary.
- Providing technical expertise to assist the response contractor in implementing the SOW in accordance with contractual documents.
- Reporting to the Government Contracting Officer's Site Manager and A&E Construction Management with progress and schedule updates.
- Maintaining documentation of ERS activities performed at a site.
- Ensuring that any required sampling events occur as needed throughout ERS activities. Any air clearance or soil confirmation sampling will be conducted in accordance with the RA SAP (CDM 2008a).
- Maintaining photographic documentation in accordance with the RA SAP.

5.3.3 Health and Safety Activities

During response contractor implementation of the Planned Design Response SOW, A&E H&S activities may include, but are not limited to:

- Providing containment inspections to ensure response contractor compliance with the RAWP, CSHASP, ERS HASP, and contractual documents.
- Providing field inspections of response contractor activities to ensure compliance with the SOW and H&S protocol.
- Managing the necessary sampling events (e.g., final air clearance or soil clearance sampling) to be performed.
- Providing encapsulation/blocking inspections to ensure removal activities comply with project criteria.
- Reviewing the ERS HASP and CSHASP for applicability to ERS activities, revising them as necessary.

Section 6
Closeout

6.1 Documentation Procedures

Following completion of ERS activities, closeout documentation to be included in project and property files must be completed and submitted for all activities ranging from an Information Only Response to a Planned Design Response.

6.1.1 ERS Tracking System Entry

The A&E ERS Administrative Support personnel update the status of the associated ERS tracking system entry following completion of any ERS activities at a property. This information will typically be communicated to the A&E ERS Administrative Support personnel by the A&E ERS Lead.

6.1.2 Property Closeout Checklist

The A&E ERS personnel performing oversight activities are required to complete a Property Closeout Checklist (Appendix Form H) when response contractor SOW activities are done.

6.1.3 EPA Cleanup Letter and Completion Form

Following completion of the Property Closeout Checklist (if applicable to properties where ERS contractor activities were performed), the A&E Administrative Support personnel will prepare a property-specific EPA cleanup letter and Removal and Restoration Completion Form. The EPA cleanup letter and Completion Form will be provided to the owner/resident for signature.

Section 7
References

CDM. 2008a. *Response Action Sampling and Analysis Plan, Revision 1, Libby, Montana.* April.

_____. 2008b. *Response Action Work Plan, Revision 2, Libby, Montana.* February.

_____. 2008c. *Contract Quality Implementation Plan. Indefinite Delivery/Indefinite Quantity Contract for the Environmental, Architectural, and Engineering Support for Department of Transportation and other agencies' Environmental needs. Revision 0.* February.

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_____. 2007b. *Quality Assurance Manual, Revision 11.* March.

_____. 2006. *Comprehensive Site Health and Safety Program, Libby, Montana, Revision 5.* December.

_____. 2003a. *Pre-Design Inspection Work Plan, Revision 1 Working Draft, Libby, Montana.* November.

_____. 2003b. *Final Draft Design Analysis Report, Libby, Montana.* November.

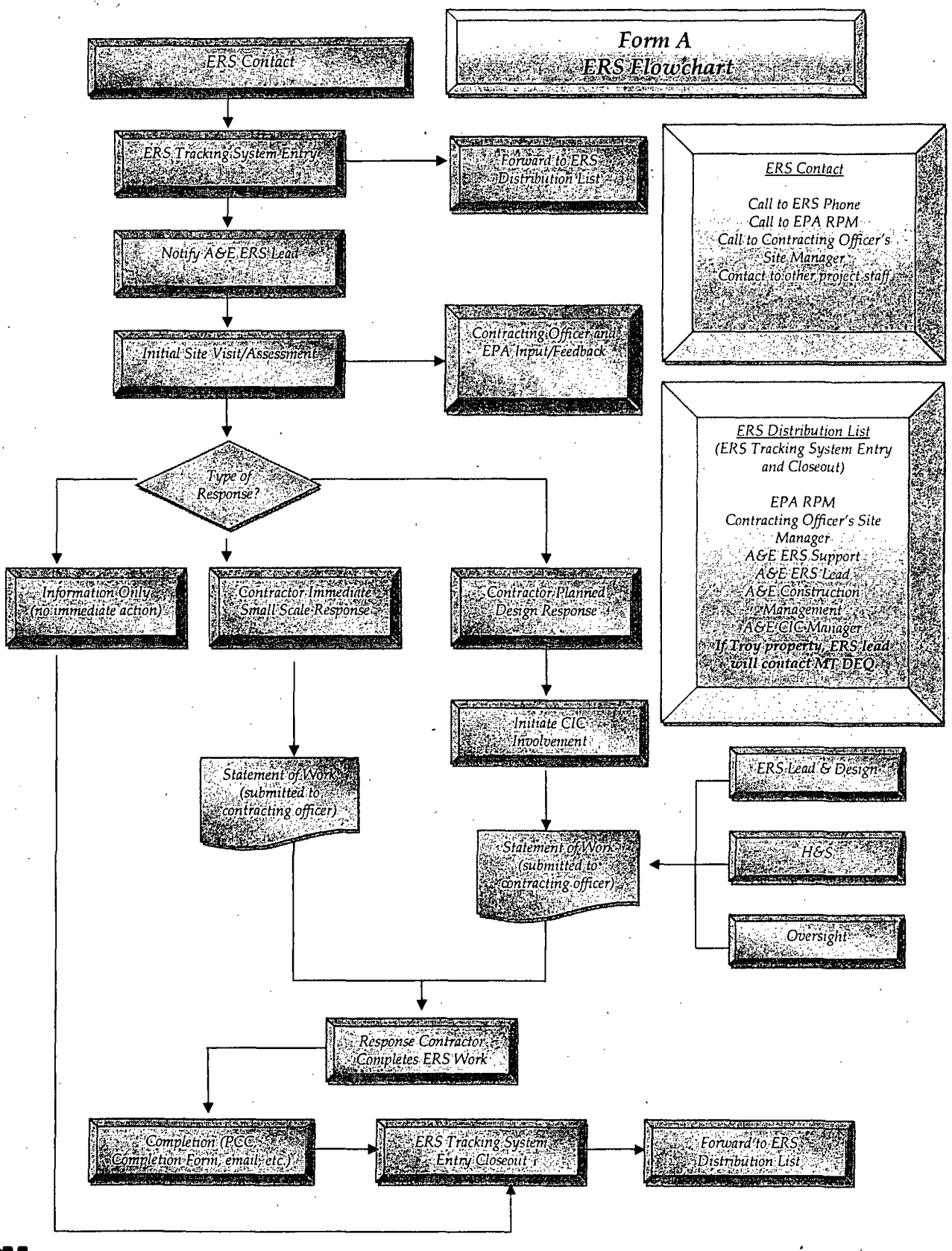
EPA. 2004. *Libby Asbestos Site, The Importance of Health and Safety, Mandatory Site Primer.*

_____. 2003. *Libby Asbestos Site Residential/Commercial Cleanup Action Level and Clearance Criteria Technical Memorandum.* December.

John A. Volpe National Transportation Systems Center (Volpe). 2003. *HEPA Vacuum Program Memorandum, Libby, Montana.* May.

Appendix

Form A: ERS Flowchart
Form B: ERS Tracking System Email Template
Form C: ERS Initial Assessment Checklist
Form D: A&E Process for Filing ERS Documentation
Form E: Primary Structure and Property Assessment Information Field Form
Form F: Secondary Structure Information Field Form
Form G: Record of Communication
Form H: Property Closeout Checklist
Form I: Emergency Medical Procedures and Map


Form A
ERS Flowchart
ERS Contact
ERS Tracking System Entry
Forward to ERS Distribution List
Notify A&E ERS Lead
Initial Site Visit/Assessment
Contracting Officer and EPA Input/Feedback
Type of Response?
Information Only (no immediate action)
Contractor Immediate Small Scale Response
Contractor Planned Design Response
Initiate CIC Involvement
Statement of Work (submitted to contracting officer)
Statement of Work (submitted to contracting officer)
ERS Lead & Design
H&S
Oversight
Response Contractor Completes ERS Work
Completion (PCC Completion Form, email, etc.)
ERS Tracking System Entry Closeout
Forward to ERS Distribution List
ERS Contact
Call to ERS Phone
Call to EPA RPM
Call to Contracting Officer's Site Manager
Contact to other project staff
ERS Distribution List
(ERS Tracking System Entry and Closeout)
EPA RPM
Contracting Officer's Site Manager
A&E ERS Support
A&E ERS Lead
A&E Construction Management
A&E CIC Manager
If Troy property, ERS lead will contact MT DEQ

Form B
ERS Tracking System Email Template

government contracting officer/Libby Asbestos Project ERS Tracking System Entry

Address: _____ Date: _____

Owner: _____ PPE: _____ eLASTIC:_____

Weather: _____ Personnel Onsite: _____

Contractor: A&E Activities: ERS Inspection

ERS Tracking System Entry

Form C
ERS Initial Assessment Checklist

Date: _____

Property Address: _____

ERS Contact Made By: _____

ERS Contact Received By: _____

Property Owner: _____

Contact Number (indicate home or cell): _____

Tenant/Resident: _____

Contact Number (indicate home or cell): _____

ERS Personnel Onsite: _____

Property Type:

Residential Property _____
Commercial Property _____
City Property _____
County Property _____
Other _____

Current Property Status:

Cleanup Completed _____ pre-design inspection (PDI) Completed _____
Contaminent Screening Study (CSS)/Troy Area Property Evaluation (TAPE) Completed _____
Pending Property _____

Identification

Exterior _____ Interior _____

Exterior

Location:

Yard _____
Specific Use Area (SUA) _____
Driveway or Alley _____
Below Ground Surface _____
Other _____

Interior

Location:

Main Structure _____ Secondary Structure _____
Detached Garage _____ Outbuilding _____
Other _____

Detailed Location:

Attic _____
Walls _____
Floor _____
Soil Floor _____
Basement _____
Crawlspace ____
Other _____

Explain:_____

Type of Suspected Contamination:

Vermiculite-containing insulation (VCI) _____ VCS _____
Plaster _____ Visible Amphibole Present ____
Other insulation_____ Other Building Material _____
No Vermiculite Observed _____

Explain:_____

Actions Required

Information Request _____
Homeowner Pending _____
Return Necessary _____
Contractor Required _____
No Action Required _____

Immediate Need _____
Addressed While Onsite _____
Design Necessary _____
Assist Local Contractor _____
Future Planning _____

Level of Effort:

Large _____ Medium _____ Small _____

Potential Timing of Removal Work: _____

Planned Start Date: _____

Anticipated Completion Date: _____

Notifications

A&E _____ ERS Tracking System Entry _____ government contracting officer _____
EPA _____

Preliminary Assessment: _____

Potential Emergency Situation (provide details)

Potential Hazards (e.g. slips, trips, falls, utilities, etc.)

Property Owner Requests/Comments:

Form D
A&E Process for Filing ERS Documentation

- If a property or completed property folder does not exist and ERS documentation is received, create a new hard copy and electronic property folder. These folders will be labeled/named according to the address listed in the onsite property/sample tracking database (eLASTIC). Ensure that the address written on the documentation also matches the eLASTIC address; contact the author for any needed revisions.

- Copy the documentation and file the copies in the corresponding hard copy property folder.

- Scan the original documentation and save the individual file(s) in .pdf format in the corresponding electronic property folder on the server. Name each file according to the address first, then the type of documentation next, separated by underscores (e.g., 100_Main_Ave_ERS_Checklist.pdf).

- Maintain the original documentation in the appropriate binder or file drawer for that type of documentation.

- Email the scanned documentation to libby@dot.gov for the Government Data Manager's files.

- Assign a document control number and make copies for distribution to the Government Data Manager and Denver and Libby project files, per the schedule determined by the Government Data Manager.

Form E
Primary Structure and Property Assessment Information Field Form

CDM

BD#_____

□ Soil samples collected (Date: _____)

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form (Primary IFF)

Field Logbook No.:_____ Page No.:_____ Site Visit Date: _____

Address:_____ Structure Description:_____

Occupant:_____ Phone Number:_____

Owner (if different than occupant):_____ Phone Number:_____

Business Name:_____

Sampling Team:_____

Field Form Check Completed by (100% of forms):_____

Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	Residential Industrial Commercial	
Surrounding Land Use	Residential Industrial Commercial School Mining Other:_____	
Year of Construction	_____ Unknown	
Square Footage		
Construction Material	Wood frame Masonry/Stone Other:_____	
Number of Floors Above Ground	1 2 3 Other:_____	
Number of Rooms Per Floor Above Ground	1:_____ 2:_____ 3:_____ Other:_____	
Basement	Yes No	
Heating Source	Wood/Coal Electric Propane/Gas Other:_____	
Heat Distribution	Forced air Radiant Other:_____	

CSS Primary Structure IFF (continued)

Address:_____ BD# _____

Data Item	Value	Notes
OCCUPANT INFORMATION		
Was the residence/building remodeled?	Yes No If yes, When (years): <2 2-5 >5 Where: Attic Living Areas Garage Basement Other:_____	
Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past?	Yes No	
Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite?	Yes No	
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information	❒ Verbal Interview Complete:_____	
Is there any knowledge of former miners, close relatives of miners, or any highly exposed persons living or visiting the property?	Yes No Unknown	If unknown, why?
Is the resident, past or present, diagnosed with an asbestos-related disease?	Yes No Unknown	If unknown, why?
Indoor Information	❒ Indoor Visual Inspection Complete:_____	
Does the interior have vermiculite attic insulation?	Yes No Unknown	If unknown, why?
Did the interior ever have vermiculite attic insulation? NA applies if attic currently has VCI	Yes No Unknown NA	If unknown, why?
Are there vermiculite additives in any of the building materials?	Yes No Unknown	If unknown, why? Type and location of building material:

CSS Primary Structure IFF (continued)

Address:_____ BD# _____

Data Item	Value	Notes
Location of indoor vermiculite (circle all that apply)	Attic Walls Crawl Space None Visual in Living Space: Basement, Ground Floor, Second Floor, Attached Garage Other:_____	If in living space, provide specific location:
Outdoor Information	❒ Outdoor Visual Inspection Complete:_____	
Location of outdoor vermiculite (circle all that apply)	*Driveway Flowerbed Garden Yard* Former Flowerbed Former Garden Stockpile None Other_____	
Overall Assessment	❒ Reconnaissance (Verbal Interview, Indoor, Outdoor Inspection) Complete:_____	
Are primary source materials present at the property?	Yes No	
Where are primary source materials located?	Inside Outside Both NA	NA applies if no primary source materials are located at the property.

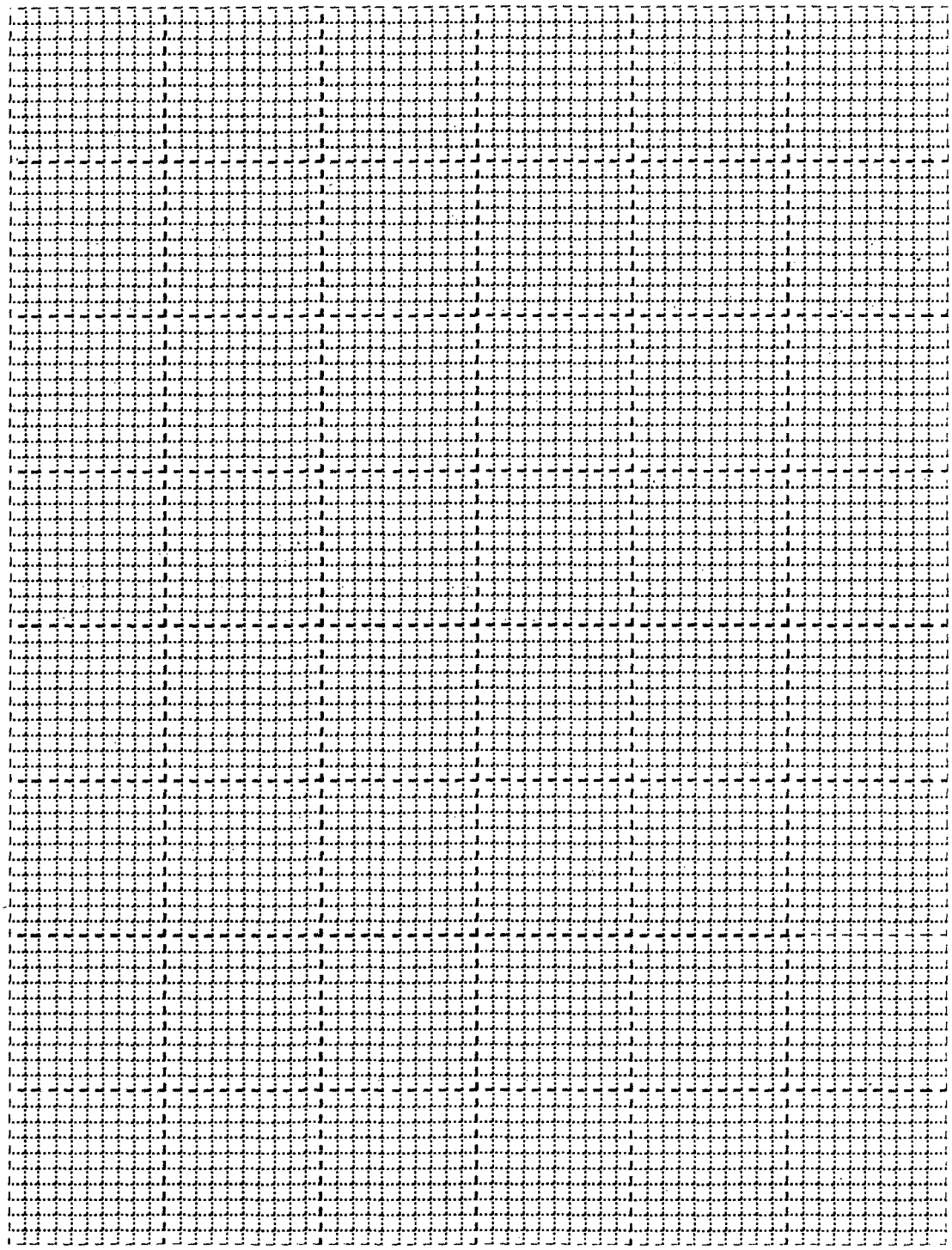
ADDITIONAL INFORMATION (Note any partial access or sample collection issues)_____

Address:_____ BD# _____

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc). **Include north arrow.**

NOT TO SCALE



Form F
Secondary Structure Information Field Form

BD#_____

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Secondary Structure Information Field Form (Secondary IFF)

Field Logbook No.:_____ Page No.:_____ Site Visit Date: _____

Address:_____ Structure Description:_____

Occupant:_____ Phone Number:_____

Owner (if different than occupant):_____ Phone Number:_____

Business Name:_____

Sampling Team:_____

Field Form Check Completed by (100% of forms):_____

Screening Field Check Completed by (2% of forms):_____

Data Item	Value	Notes
STRUCTURE ATTRIBUTES		
Property Description	Residential Industrial Commercial	
Surrounding Land Use	Residential Industrial Commercial School Mining Other:_____	
Year of Construction	_____ Unknown	
Square Footage		
Construction Material	Wood frame Masonry/Stone Other:_____	
Number of Floors Above Ground	1 2 3 Other:_____	
Number of Rooms Per Floor Above Ground	1:_____ 2:_____ 3:_____ Other:_____	
Basement	Yes No	
Heating Source	Wood/Coal Electric Propane/Gas NA Other:_____	
Heat Distribution	Forced air Radiant NA Other:_____	
Was the building remodeled?	Yes No	

Address:_____ BD#_____

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information	❒ Verbal Interview Complete:_____	
Is there any knowledge of former miners, close relatives of miners, or any highly exposed persons living or visiting the property?	Yes No Unknown	If unknown, why?
Is the resident, past or present, diagnosed with an asbestos-related disease?	Yes No Unknown	If unknown, why?
Indoor Information	❒ Indoor Visual Inspection Complete:_____	
Does the interior have vermiculite attic insulation?	Yes No Unknown	If unknown, why?
Did the interior ever have vermiculite attic insulation? NA applies if attic currently has VCI	Yes No Unknown NA	If unknown, why?
Are there vermiculite additives in any of the building materials?	Yes No Unknown	If unknown, why? Type and location of building material:
Location of indoor vermiculite (circle all that apply)	Attic Walls Crawl Space None Visual in Living Space: Basement, Ground Floor, Second Floor, Attached Garage Other:_____	If in living space, provide specific location:

ADDITIONAL INFORMATION (Note any partial access or sample collection issues)_____

Form G

A&E Record of Communication

Libby Asbestos Project

Owner Name: _____ Phone: _____

Tenant Name: _____

Property Address: _____

ERS Personnel: _____

Date	Time	Author	Contact Summary

Form H
Property Closeout Checklist

Form Number _____

LIBBY ASBESTOS PROJECT
Property Closeout Checklist (PCC)
Revision 3

Form Date: _____

Field Logbook No.: _____ Page No.'s: _____

_____ _____

Address: _____ City: _____

Occupant: _____

Owner: _____

Oversight Personnel: _____

Removal Contractor: _____

Restoration Contractor: _____

Associated BD Numbers: _____

PCC Check Completed by (100% of forms): _____ Date: _____

Data Item	Value		Comments
Type of removal activity *circle all that apply*	VCI removal Interior cleaning Exterior removal Building materials Other: _____		*Circle all that apply:* Quick Response | Partial Removal
	Start	Finish	
Interior setup date(s)			*NA implies interior work not needed*
Interior removal date(s)			*NA implies interior work not needed*
Interior restoration date(s)			*NA implies interior work not needed*
Exterior setup date(s)			*NA implies exterior work not needed*
Exterior removal date(s)			*NA implies exterior work not needed*
Exterior restoration date(s)			*NA implies exterior work not needed*
Total days at property [include weekends]			
Contaminated material removed *circle all that apply*	Soil VCI Other insulation Household items Rubbish/Debris Other _____		

Form Number _____

Data Item	Value	Comments
Cubic yards (Yd^3) of contaminated material removed:		
Soil	_____ Yd^3 NA	
VCI	_____ Yd^3 NA	
Other insulation	_____ Yd^3 NA	Type of insulation removed:
Household items	Description: NA	
Rubbish/Debris	_____ Truckloads NA	Description:
Any contaminated material remaining after removal is complete? *[responses must be consistent within the shaded sections]*	No - *circle if next two items are circled NA below* Soil - *circle if Contaminated soil remaining is circled below* VCI - *circle if VCI remaining is circled below*	
[responses must be consistent within the shaded sections] Contaminated soil remaining NA *[When revising this section also revise corresponding item in shaded section above]*	Location description:	
[responses must be consistent within the shaded sections] VCI remaining NA *[When revising this section also revise corresponding item in shaded section above]*	Location description: [include RAWP Addendum background information]	

Cubic yards (Yd^3) of material replaced:

Data Item	Value	Comments
Insulation	_____ Yd^3 NA	Type:
Residential fill	_____ Yd^3 NA	
Topsoil	_____ Yd^3 NA	
Other material (i.e., gravel)	_____ Yd^3 NA	Type:
HEPA vacuum given to resident?	Date: _____ Not given	Reason:
Items damaged during construction	☐ See removal and restoration checklist ☐ None	

ADDITIONAL INFORMATION

Form I
Emergency Medical Procedures and Map

QUICK REFERENCE
MEDICAL EMERGENCY PROCEDURES

In the event of a medical emergency the following general procedures should be followed:

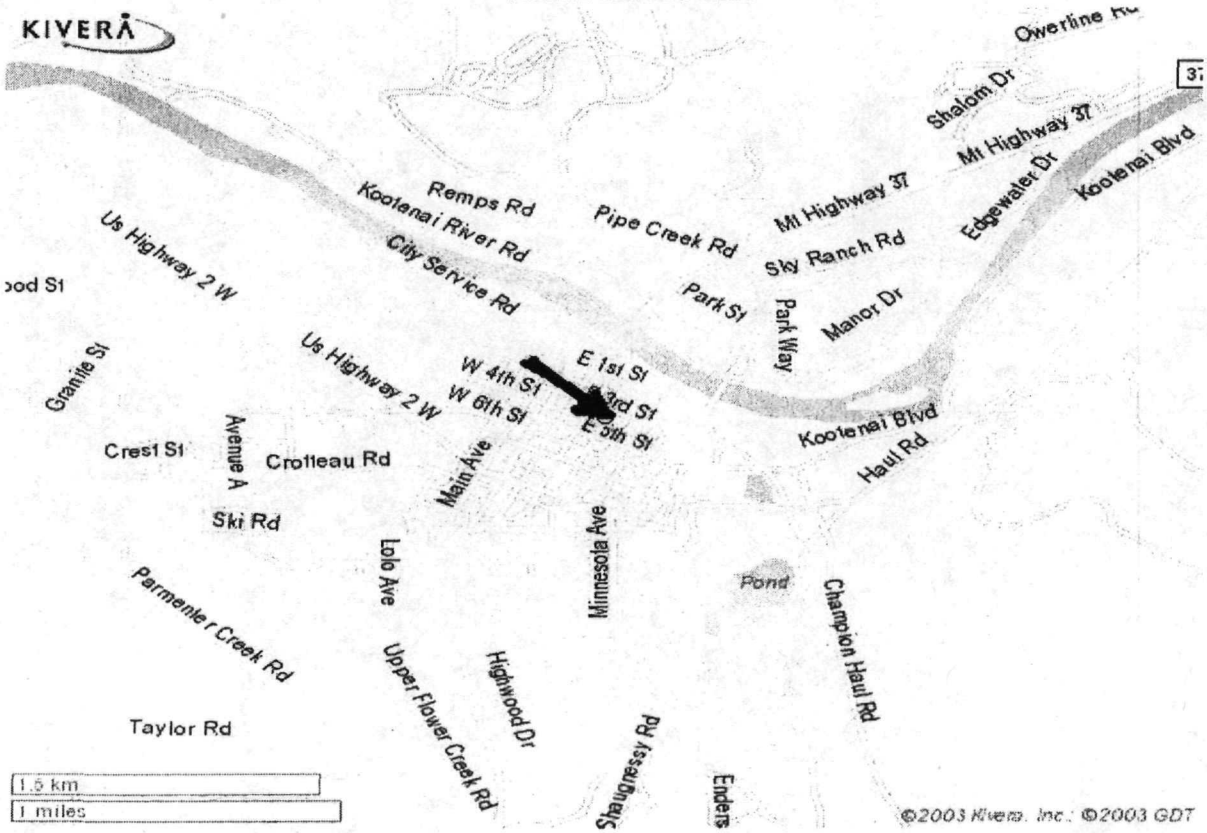
1. **Assess the situation. DO NOT MOVE PATIENT if a head, neck or back injury is expected, unless remaining in place is dangerous to patient's life.**
2. **Call 911 and notify.**
3. **Call Emergency contacts below to report emergency.**

If medical condition is life threatening, secure medical treatment ASAP

EMERGENCY CONTACTS

Mike Cirian, PE, EPA RPM	**(406)-202-3791**
ERS Phone	**(406)-291-5335**
Courtney Zamora, Contracting Officer's Site Manager	**(617)-694-7699**
Damon Repine, CSP, A&E H&S Manager	**(406)-293-1374**
Dominic Pisciotta, A&E H&S	**(406)-291-4249**
EPA Information Office, Libby	**(406)-293-6194**

ST. JOHNS LUTHERAN HOSPITAL
350 Louisiana Ave,
Libby, MT 59923
Phone: 406-293-0100



SECTION 6

DEED RESTRICTION

ATTACHMENT F
DECLARATION OF RESTRICTIVE COVENANTS ON REAL PROPERTY

THIS DECLARATION OF RESTRICTIVE COVENANTS ON REAL PROPERTY is made by [insert owner's name] as of [insert date].

RECITALS

WHEREAS, [insert owner's name] is the owner of certain real property (the Subject Property) located in [insert county name] County, Montana, more particularly described as:

[insert property description]

WHEREAS, the Subject Property is located within the [insert facility name] (Facility) upon which hazardous or deleterious substances have come to be located; and

WHEREAS, [insert voluntary cleanup applicant's name] is seeking approval from the Montana Department of Environmental Quality (DEQ) for a Voluntary Cleanup Plan (VCP) for the Facility. As part of the VCP, [insert voluntary cleanup applicant's name] desires to restrict development on the Subject Property and [insert owner's name] is willing to record such restrictions in order to finalize the VCP:

NOW, THEREFORE, [insert owner's name] hereby agrees and declares:

1. No wells may be drilled within the boundaries of the Subject Property without the express prior written approval of DEQ. Groundwater within the Subject Property may not be used for any purpose other than sampling without the express prior written approval of DEQ. The integrity of any monitoring wells must be maintained and no seals may be removed on any closed wells.

2. No soil or soil caps shall be disturbed in any manner, including without limitation drilling or excavation, without the express prior written approval of DEQ.

3. No [insert restricted use (e.g., residential, industrial, commercial, etc.] development shall occur upon the Subject Property. No structures, containments, footings for any purpose, or similar below ground appurtenances may be constructed upon the Subject Property.

4. No irrigation of any kind may occur on the Subject Property.

5. No action shall be taken, allowed, suffered, or omitted on the Subject Property if such action or omission is reasonably likely to create a risk of migration of hazardous or deleterious substances or a potential hazard to public health, safety, or welfare or the environment or result in a disturbance of the structural integrity of any engineering controls designed or utilized at the Facility to contain

IN WITNESS WHEREOF I have hereunto set my hand and affixed my official seal the day and year hereinabove first written.

_____
NOTARY PUBLIC FOR THE STATE OF MONTANA

(SEAL)

Residing at _____

My Commission Expires: _____

SECTION 7

INFORMATION/EDUCATION

Information and Education

The O&M workgroup brainstormed several possibilities. Some things are already occurring. Following is a list developed by the O&M group at their May 19, 2010 meeting:

- Asbestos-specific 2-hour in-service training (in conjunction with regular comprehensive contractor training)
- Working with existing organizations and contractors (e.g. City Tree Board, utilties, etc.)
- Working with permittees when the use agreements are being signed with the City.
- Preventive measures such as using concrete/sand filled buckets instead of digging for stakes to secure tents, etc. can meet several objectives, including protection of the remedy.
- Signage (using recently installed bulletin board)
- Pamphlets, brochures, handouts
- Schools: working with teachers and students
- General media exposure

ATTENTION CONTRACTORS

Don't Miss This Opportunity for FREE Training!!!!!

EPA and the Lincoln County Campus of the Flathead Valley Community College (FVCC) are offering local contractors an opportunity to get free work place training focused on what to do if you encounter vermiculite or Libby asbestos.

We are offering four classes:

- *40-hr HAZWOPER Worker (February 16 to 19, 2010)*
- *40-hr Contractor/Supervisor (February 22 to 26, 2010)*
- *8-hr HAZWOPER refresher (March1, 2010)*
- *8-hr Contractor/Supervisor refresher (March 2, 2010)*

To register, call the Lincoln County Campus of the FVCC (293-2721 ext. 235)

Call NOW!
Only 20 students per class!!

Training will be held in Libby at the Lincoln County Campus, 225 Commerce Way

Don't

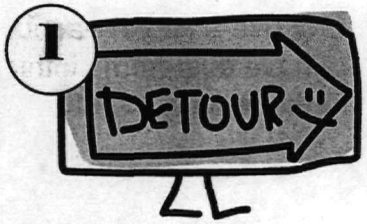
let an unwanted visitor into your home!!

13 simple steps to protect yourself and your loved ones from Libby Amphibole Asbestos (LA)

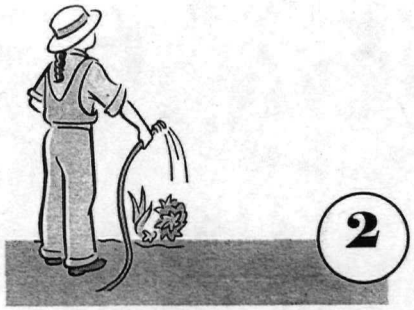
Reducing contact with disturbed, contaminated soil is important in reducing your exposure to LA. LA poses the greatest threat when it is airborne.
For a lower risk of exposure, focus on keeping contaminated soil from being disturbed in your yard and trapped in your home.

This flyer gives some common sense tips on avoiding exposure to LA on your property.

Outdoors:



DON'T disturb areas where you can see vermiculite *(see picture on back)*. Find other places to play or garden.

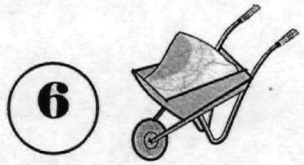


DO water often. A healthy lawn reduces dust and contact with bare soil.

DO mow your lawn when it's damp – not when it's dry and dusty.

DON'T dig, cultivate, or roto-till your garden soil when it is dry and dusty, and do suppress any dust with water.

DO rinse off gardening tools outside.



DON'T buy or accept free topsoil or fill from an unknown source. If you are unsure, call the EPA Info Center.